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August 18, 2024

Via ECF and Email

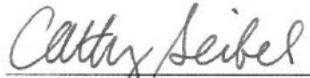
Honorable Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601
chambersnysdseibel@nysd.uscourts.gov

Conference adjourned to 10/9/24 at 2:15 p.m. The time between now and then is hereby excluded under the Speedy Trial Act in the interests of justice. The ends of justice served by the exclusion outweigh the best interests of the public and the defendant in a speedy trial because it will enable the parties to finalize an agreement regarding a disposition without trial, and will enable the defendant to prepare for the plea with his counsel.

8/19/24

SO ORDERED.

RE: USA-vs-Luis Bladimir Henriquez Rondon
Case No. 23-CR-653 (PMH)


CATHY SEIBEL, U.S.D.J.

Dear Judge Seibel:

The above caption matter is scheduled for a Status Conference on August 27, 2024. As the Court knows our client is currently on electronic monitoring and home confinement under the supervision of the United States Probation Department.

Since the last court date our office, with the assistance of the United States Probation Department, has met with Mr. Rondon with the help of the Spanish interpreter on several occasions. We have reviewed all of the discovery with him and he understands the charges, and he appreciates the government's allegations against him.

Our office has also been in constant communication with the Government in regards to this case, and we have worked out a plea agreement upon which our client will need time to review and propose any changes.

Today, Sunday, August 18, 2024, I just received a proposed plea agreement via email from the Government. I have started to review it, and it appears that we will be entering into an agreement. In this vein, we will not be needing the Court to issue a motion schedule nor a trial date.

Therefore, please consider this letter a status update regarding the progress of the case, and an unopposed request to adjourn the August 27, 2024 Status Conference. Instead, the parties are requesting that the matter be scheduled for a Rule 11 change of plea either before your honor, or before a magistrate on any afternoon in October and prior to the Thanksgiving holiday, November 24th.

If this request is denied, I request permission of this honorable Court to appear remotely on August 27, 2024, as I will be traveling out of the country for a wedding beginning August 22, 2024. If I have no choice, I would have to find a flight back for this Status Conference, and then fly back to meet my family.

We have worked very hard in coming to this plea agreement and I trust that we will be moving towards a change of plea. As such, it is in the interest of justice to adjourn the scheduled Status Conference to allow the parties to work on this plea agreement. The speedy trial time can be charged to the defense. As always I remain:

Very truly yours,

for Crosland Law Group LLC



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cc: Kindar Prussien, Esq. (kingdar.prussien@usdoj.gov)